

Exhibit 6

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**Infringement of U.S. Patent No. 9,730,484
by lululemon**

The allegations made herein are based on information currently available to Nike. Nike reserves the right to amend and/or supplement these allegations based on information provided during the course of this case, including during the course of fact and expert discovery that has yet to take place. Nike also reserves the right to supplement and/or amend these allegations in light of the construction of any claim terms that are disputed by the parties and to the extent that such claim construction affects any of the claims set forth in the chart below. In the event that a claim element is deemed to be missing under a literal infringement analysis (*e.g.*, due to claim construction), Nike reserves the right to demonstrate the presence of a substantial equivalent of such an element and to pursue infringement under the doctrine of equivalents. Moreover, no statements made herein are intended as an admission regarding the meaning of any claim term.

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'484 Patent Claim Limitations	Evidence of Infringement
<p>1[pre]. An article of footwear comprising an upper including a flat-knitted element formed from at least one yarn mechanically manipulated in a flat-knitting process, the flat-knitted element including a first layer having:</p>	<p><i>To the extent the preamble is limiting, the lululemon Chargefeel Mid is an article of footwear comprising an upper. Upon information and belief, the upper includes a flat-knitted element formed from at least one yarn mechanically manipulated in a flat-knitting process and a first layer. For example, the Chargefeel Mid upper contains a heel seam which, upon information and belief, suggests the use of flat-knit manufacturing processes for creating an upper. See, e.g.:</i></p> <p>Chargefeel Mid https://shop.lululemon.com/p/shoes/W-Chargefeel-Workout-Mid/_/prod11110148)</p>  <p>Flat-Knitted Element Formed From At Least One Yarn</p> <p>A First Layer</p> <p>Article of Footwear</p>

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<p>1[a]. a central portion having a domed, three-dimensional structure configured for extending over the top of a foot;</p>	<p><i>The flat-knitted element of the lululemon Chargefeel Mid has a central portion over the throat area of the upper having a domed, three-dimensional structure configured for extending over the top of the foot, as shown in the dashed boxes below.</i></p> <p>Chargefeel Mid https://shop.lululemon.com/p/shoes/W-Chargefeel-Workout-Mid/_/prod11110148)</p>

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<p>1[b]. a first side portion being formed of unitary construction with the central portion and extending from a first side of the central portion; and</p>	<p><i>Upon information and belief, the flat-knitted element has a first side portion formed of unitary construction with the central portion that extends from one side of the central portion in the area shown by the dashed boxes below.</i></p> <p>Chargefeel Mid (https://shop.lululemon.com/p/shoes/W-Chargefeel-Workout-Mid/_/prod11110148)</p>

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<p>1[c][i]. a second side portion being formed of unitary construction with the central portion and extending from a second side opposite the first side of the central portion,</p>	<p><i>Upon information and belief, the flat-knitted element has a second side portion formed of unitary construction with the central portion that extends from a second side opposite the first side of the central portion in the area shown by the dashed boxes below.</i></p> <p>Chargefeel Mid (https://shop.lululemon.com/p/shoes/W-Chargefeel-Workout-Mid/_/prod11110148)</p>

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1[c][ii]. the domed, three-dimensional structure shaped to extend above the plane of the first side portion and the second side portion when the flat-knitted

Upon information and belief, when the flat-knitted element is in a flattened configuration, e.g., when the heel seam is removed and the collar portion of the flat-knitted element (shown in the black box below) is flattened against a planar surface, the domed, three-dimensional structure (shown in the red box below) is shaped to extend above the planar surface.

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element is in a flattened configuration.

Chargefeel Mid

(https://shop.lululemon.com/p/shoes/W-Chargefeel-Workout-Mid/_/prod11110148)

